

REMARKS

In the present application, Claims 14, 17-19, 21-24, 29-33 and 38-48 are pending. In the above Office Action, the Examiner rejected the claims under 35 U.S.C. §103(a) as being unpatentable over *Caine* (5,361,078) in view of *Odryna et al.* (6,104,414). Applicant respectfully traverses Examiner's rejection.

Claims 14 17 – 19, and 21 – 23 have been cancelled without prejudice. New claims 49 – 55 have been added to more clearly claim the subject matter that Applicant regards as the invention.

Caine discloses a display system that uses information from a host computer for display on a wall of video screens. Each screen displays a portion of an image. The system is comprised of a plurality of video channels, each channel driving a display. Each video channel is further comprised of a video driver connected to memory dedicated to that particular video channel. A status register is used to select a multiplexer (see column 3, lines 1 – 4), to select an overlay color for the video drivers (see column 3, lines 37 – 39), and to control the number of images stored, how they are sequenced, and whether the information displayed on the screens relates from screen to screen (see column 6, lines 16 – 21).

Odryna et al. discloses a video distribution hub for driving a plurality of video displays to act as a virtual monitor. The distribution hub receives a video signal from a video source, the hub processes the signal, and stores selected data segments in a plurality of frame buffers. The data in the plurality of frame buffers then drives displays connected to the respective frame buffer.

Caine neither teaches nor suggests Applicant's invention as claimed in the present invention. The coupling module and the coupling controller of the present invention provide the capability for a single display controller to be coupled to a plurality of screen memory portions in response to configuration properties such as display resolution and refresh rate. Additionally, the coupling module and the coupling controller, in response to the configuration properties, can couple a single display driver to a plurality of screen memory portions.

The Examiner contends that the status register of *Caine* corresponds to the coupling controller of the present invention. However, the status register of *Caine* is not

coupled to a coupling module for controlling which screen memory is coupled to which display driver or display controller. In fact, since the video drivers and video memory of *Caine* comprise a video channel that is dedicated to one display, it is not possible for the status register in *Caine* to have the same structure or perform the same tasks as the coupling controller of the present invention.

Even if it is assumed that the status register of *Caine* corresponds to the coupling controller of the present invention, *Caine* does not have any structure that corresponds to the coupling module of the present invention. In fact, there cannot be any corresponding structure in *Caine* since each video channel is dedicated to a particular display.

Recent court decisions have held that in order for prior art references to be combined by obviousness, at a minimum, there must be a suggestion of desirability for the modification. *In re Fritch*, 922 F.2d 1260, 23 USPQ 2d 1780 (Fed. Cir. 1992). Most recently, a court has held that the motivating suggestion must be explicit. *Winner International Royalty Corp. v. Wang*, 48 USPQ 2d 1139 (D.C. Dist.Ct. 1998), *aff'd*, 98-1553 slip op. (Fed. Cir. 2000). *Caine* and *Odryna et al.* do not suggest desirability for modification, explicit or otherwise. In fact, *Caine* and *Odryna et al.* neither teach nor suggest the present invention. Additionally, since neither of the cited references teach or suggest a coupling controller controlling, in response to configuration properties, access to predetermined screen memory portions by the plurality of display drivers or the coupling of predetermined screen memory portions to the plurality of display controllers, the combination of any of the cited references cannot produce the Applicant's invention as claimed.

In the interest of clarity, Applicant has discussed only the differences described above between the art cited by the Examiner and the present claimed invention. The above-described differences do not represent all of the possible differences between the two.

For the above-stated reasons, Applicant believes that his invention is patentable over the prior art. Applicant respectfully requests that the Examiner allow the Applicant's invention as set forth in claims 24, 29 – 33, and 38 - 55. No new matter has been added and no additional fee is required by this amendment.

RESPECTFULLY SUBMITTED,

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